

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION**

MDL NO. 2327

THIS DOCUMENT RELATES TO THE
CASE(S) LISTED ON THE EXHIBIT
ATTACHED HERETO:

JOINT MOTION TO DISMISS CERTAIN DEFENDANTS WITH PREJUDICE

Plaintiffs in the cases listed on the attached Exhibit A and Defendant C. R. Bard, Inc. advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims.

Accordingly, Plaintiffs and Bard jointly move the court to dismiss Bard with prejudice in the cases listed on the attached Exhibit A, with each party to bear its own costs.

The settlements in the cases listed on Exhibit A relate only to the Covidien entities and Bard. Because other Defendant(s) remain in the cases listed on Exhibit A, the case(s) should remain open and Plaintiffs will continue to prosecute their claims against any remaining defendants.

Respectfully submitted this 21st day of March, 2018, by:

/s/ Jim M. Perdue, Jr.
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EXHIBIT A – PERDUE KIDD & VICKERY

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-cv-23303	Savage, Carolyn and Jack

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ Richard B. North, Jr. _____
Richard B. North, Jr.
Attorney for C.R. Bard, Inc.